Iowa Department of Natural Resources Title V Operating Permit

Name of Permitted Facility: Woodharbor Molding and Millworks,

Inc.

Facility Location: 3277 9th Street SW

Mason City, Iowa 50401

Air Quality Operating Permit Number: 00-TV-027R1

Expiration Date: October 14, 2013

Permit Renewal Application Deadline: April 14, 2013

EIQ Number: 92-6876

Facility File Number: 17-01-068

Responsible Official

Name: Jon Lewerke Title: Vice President

Mailing Address: 3277 9th Street SW

Mason City, IA 50401

Phone #: (641) 423-0444

Permit Contact Person for the Facility

Name: Myron Lupkes

Title: Facilities Engineer/Maintenance Manager

Mailing Address: 3277 9th Street SW

Mason City, IA 50401

Phone #: (641) 423-0444

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

For the Director of the Department of Natural Resources

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	Abbreviations
acfm	actual cubic feet per minute
	Code of Federal Regulation
CE	
CEM	continuous emission monitor
°F	degrees Fahrenheit
	emissions inventory questionnaire
EP	
EU	emission unit
gr./dscf	grains per dry standard cubic foot
	Iowa Administrative Code
IDNR	Iowa Department of Natural Resources
	motor vehicle air conditioner
NAICS	North American Industry Classification System
NSPS	new source performance standard
ppmv	parts per million by volume
lb./hr	pounds per hour
lb./MMBtu	pounds per million British thermal units
SCC	Source Classification Codes
scfm	standard cubic feet per minute
SIC	.Standard Industrial Classification
TPY	tons per year
USEPA	United States Environmental Protection Agency
Pollutants	
PM	particulate matter
$PM_{10} \dots \dots \dots \dots \dots$	particulate matter ten microns or less in diameter
SO_2	sulfur dioxide
$NO_x \dots \dots$	
VOC	volatile organic compound
CO	
HAP	hazardous air pollutant

I. Facility Description and Equipment List

Facility Name: Woodharbor Molding and Millworks, Inc.

Permit Number: 007-TV-027R1

Facility Description: Wood Cabinetry Manufacturer (SIC2434)

Equipment List

A. Various Woodworking Processes

Emission	Emission		IDNR
Point	Unit	Emission Unit Description	Construction
Number	Number		Permit Number
EP5	EU5	Various Woodworking Processes	95-A-793-S1
EP6	EUS	Various Woodworking Processes	95-A-794-S1
EP7	EU7	Various Woodworking Processes	98-A-063-S1
EP12	EU12	TimeSaver Sander	98-A-470
EP25	EU25	Various Woodworking Processes	01-A-1069-S1

B. Spray Booths

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
EP3	EU3	Stain Booth	94-A-482-S8
EP8	EU8	Topcoat Booth	98-A-064-S7
EP9	EU9	Sealer Booth	98-A-065-S7
EP10	EU10	Stain Booth	98-A-066-S7
EP13	EU13	Studio Booth	06-A-508
EP14	EU14	Custom Booth	99-A-415-S6
EP15	EU15	Custom Booth	07-A-1552
EP19	EU19	Stain Booth	00-A-709-S4
EP20	EU20	Sealer/Topcoat Spray Booth	00-A-710-S4
EP21	EU21	Glaze Booth	00-A-711-S4
EP22	EU22	Sealer/Topcoat Spray Booth	00-A-712-S4
EP23	EU23	Sealer/Topcoat Spray Booth	00-A-713-S4
EP28	EU28	Spray Booth 28	03-A-402-S3
EP29	EU29	Spray Booth 29	03-A-403-S3
EP30	EU30	Flat Line Spray Booth	03-A-1354-S2
EP32	EU32	Spray Booth 32	06-A-509
EP33	EU33	UV Mist Coater	07-A-1074
EP35	EU35	Spray Booth	07-A-1076

C. Ovens

Emission Point	Emission Unit	Emission Unit Description	IDNR Construction
Number	Number	•	Permit Number
EP31	EU31	Flat Line Drying Oven	03-A-1355
EP34	EU34	UV Cure Oven	07-A-1075

D. Miscellaneous Sources

Emission Point Number	Emission Unit Number	Emission Unit Description	IDNR Construction Permit Number
EP4	EU4	Weld Bench	94-A-483-S2
EP16	EU16	Adhesive Application	03-A-1248
EP24A	EU24	Pump Room/Inventory Holding Area	00-A-723-S3
EP24B	EU24	Fullip Room/inventory Holding Area	00-A-724-S3
EP26	EU26	Putty Application	N/A
EP27	EU27	Parts Washer	03-A-336

Insignificant Activities Equipment List

Insignificant Emission	Insignificant Emission Unit Description					
Unit Number						
EU-17	Solvent Parts Washer					
EU-18	19 Building Makeup Air Units and One Boiler ⁽¹⁾ (all natural gas fired with					
EU-16	capacities less than 10MMBtu/hr)					
EU-36	Flat Line Sander					
EU-37	Downdraft Sanding Table					

⁽¹⁾ The boiler is of the source type regulated by the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (567 IAC 23.1(4)"dd", 40 CFR Part 63, Subpart DDDDD), but is not subject to the initial notification or any other requirements of Subparts DDDDD or A of 40 CFR Part 63. On July 30, 2007, the DC Circuit Court vacated 40 CFR Part 63, Subpart DDDDD).

II. Plant-Wide Conditions

Facility Name: Woodharbor Molding and Millworks, Inc.

Permit Number: 007-TV-027R1

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: Five (5) Years Commencing on: October 15, 2008

Ending on: October 14, 2013

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Emission Limits

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO₂): 500 parts per million by volume

Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a"

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

- 1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
- 3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
- 4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
- 5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

Emission Limits: Facility-Wide

The atmospheric emissions from the facility shall not exceed the following:

Authority for Requirement: Iowa DNR Construction Permit 94-A-482-S8, (see Emission Point-Specific Conditions for other construction permit citations)

(1) This is a facility wide limit for the solvent and coating material VOC emissions at Woodharbor. The limit was requested for the facility to remain a synthetic minor for PSD.

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, Woodharbor Molding and Millworks, Inc. is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term,

Woodharbor Molding and Millworks, Inc. shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

40 CFR 63 Subpart JJ

This facility is subject to 40 CFR 63 Subpart JJ-National Emission Standards for Wood Furniture Manufacturing Operations. The affected units are the various spray booths and the adhesive application and specific requirements are listed in the Emission Point Specific section of this permit.

Authority for Requirement: 40 CFR 63 Subpart JJ

567 IAC 23.1(4)"aj"

III. Emission Point-Specific Conditions

Facility Name: Woodharbor Molding and Millworks, Inc.

Permit Number: 007-TV-027R1

Emission Point ID Number: See Table: Various Woodworking Processes

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Various Woodworking Processes Emissions Control Equipment ID Number: See Table: Various Woodworking Processes Emissions Control Equipment Description: See Table: Various Woodworking Processes

Table: Various Woodworking Processes

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Control Equipment Number	Control Equipment Description	Raw Material	Rated Capacity (lb/hr)
EP5	EU5	Various Woodworking	CE5	Cyclone and	wood	1,200
EP6	E03	Processes	CES	Baghouse	wood	1,200
EP7	EU7	Various Woodworking CE7 Processes		Baghouse	wood	1,200
EP12	EU12	TimeSaver Sander	CE12	Baghouse	Wood	1,200
EP25	EU25	Various Woodworking Processes	CE25	Baghouse	wood	1,200

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Table: Various Woodworking Processes-Emission Limits

Emission Point Number	Associated Emission Unit Number	Emission Unit Limit PM Limit Lim		Authority for Requirement (Construction Permit Number)	
EP5	EU5	40% ⁽¹⁾	1.02	N/A	95-A-793-S1
EP6	EUS		1.02	IN/A	95-A-794-S1
EP7	EU7	40% ⁽¹⁾	N/A	0.01	98-A-063-S1
EP12	EU12	20% ⁽²⁾	N/A	$0.1^{(3)}$	98-A-470
EP25	EU25	40% ⁽¹⁾	N/A	$0.1^{(3)}$	01-A-1069-S1

- ⁽¹⁾ An exceedence of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
- ⁽²⁾ An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).
- (3) Additional Authority for Requirement 567 IAC 23.3(2)"a"

Emission Point Characteristics

These emission points shall conform to the specifications listed below.

Table: Various Woodworking Processes – Emission Point Characteristics

			Stack Characteristics				
Emission Point Number	Associated Emission Unit Number	Construction Permit No.	Height (feet)	Diameter (inches)	Exhaust Flowrate (scfm)	Exhaust Temp. (°F)	Discharge Style
EP5	EU5	95-A-793-S1	35.85	38x38	23,850	70	N/A
EP6	EUJ	95-A-794-S1	35.85	38x38	23,850	70	N/A
EP7	EU7	98-A-063-S1	29.58	25x32	29,950	Ambient	Downward
EP12	EU12	98-A-470	36.83	12	2,100	70	N/A
EP25	EU25	01-A-1069-S1	30	60	41,181	Ambient	Vertical unobstructed

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Various Woodworking Processes – Emission Point Characteristics

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The	owner/operator	of	this	equipment	shall	comply	with	the	monitoring	requirements	listed
helo	w,										

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂

Compliance Assu	rance Monitoring (CAM) Plan Required?
See Appendix A.	Required for EU5, EU7, and EU25.

Yes 🛛 No 🗌

Emission Point ID Number: See Table: Spray Booths

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Spray Booths Emissions Control Equipment ID Number: See Table: Spray Booths Emissions Control Equipment Description: See Table: Spray Booths

Table: Spray Booths

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Control Equipment Number	Control Equipment Description	Raw Material	Rated Capacity (oz/hr)
EP3	EU3	Stain Booth	CE3	Spray Booth Dry Wall Filter	Wood Stain	1,800
EP8	EU8	Topcoat Booth	CE8	Spray Booth Dry Wall Filter	Topcoat	1,800
EP9	EU9	Sealer Booth	CE9	Spray Booth Dry Wall Filter	Sealer	1,800
EP10	EU10	Stain Booth	CE10	Spray Booth Dry Wall Filter	Wood Stain	1,800
EP13	EU13	Studio Booth	CE13	Spray Booth Dry Wall Filter	Wood Coatings	600
EP14	EU14	Custom Booth	CE14	Spray Booth Dry Wall Filter	Wood Coatings	1,800
EP15	EU15	Custom Booth	CE15	Spray Booth Dry Wall Filter	Wood Coatings	486
EP19	EU19	Stain Booth	CE19	Spray Booth Dry Wall Filter	Wood Stain	1,020
EP20	EU20	Sealer/Topcoat Spray Booth	CE20	Spray Booth Dry Wall Filter	Sealer and Topcoat	1,020
EP21	EU21	Glaze Booth	CE21	Spray Booth Dry Wall Filter	Glaze	1,020
EP22	EU22	Sealer/Topcoat Spray Booth	CE22	Spray Booth Dry Wall Filter	Sealer and Topcoat	1,020
EP23	EU23	Sealer/Topcoat Spray Booth	CE23	Spray Booth Dry Wall Filter	Sealer and Topcoat	1,020
EP28	EU28	Spray Booth 28	CE28	Spray Booth Dry Wall Filter	Wood Coatings	1,800
EP29	EU29	Spray Booth 29	CE29	Spray Booth Dry Wall Filter	Wood Coatings	1,800
EP30	EU30	Flat Line Spray Booth	CE30	Spray Booth Dry Wall Filter	Wood Coatings	6,750
EP32	EU32	Spray Booth 32	CE32	Spray Booth Dry Wall Filter	Wood Coatings	600

Table: Spray Booths (cont.)

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Control Equipment Number	Control Equipment Description	Raw Material	Rated Capacity (oz/hr)
EP33	EU33	Mist Coater	CE33	5 Layer Dry Filter	Various Finishes	44.8
EP35	EU35	Spray Booth	CE35	Spray Booth Wall Filter	Wood Coatings	1,800

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Table: Spray Booths-Emission Limits

Emission Point Number	Associated Emission Unit Number	Opacity Limit 567 IAC 23.3(2)"d"	PM Limit (gr./dscf) 567 IAC 23.4(13)	PM ₁₀ Limit (lb/hr)	VOC Limit (TPY)	Authority for Requirement (Construction Permit Number)
EP3	EU3	40%(1)	0.01	1.543	238 ⁽²⁾	94-A-482-S8
EP8	EU8	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	98-A-064-S7
EP9	EU9	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	98-A-065-S7
EP10	EU10	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	98-A-066-S7
EP13	EU13	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	06-A-508
EP14	EU14	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	99-A-415-S6
EP15	EU15	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	07-A-1552
EP19	EU19	40% ⁽¹⁾	0.01	0.231	238 ⁽²⁾	00-A-709-S4
EP20	EU20	40% ⁽¹⁾	0.01	0.231	238 ⁽²⁾	00-A-710-S4
EP21	EU21	40% ⁽¹⁾	0.01	0.231	$238^{(2)}$	00-A-711-S4
EP22	EU22	40% ⁽¹⁾	0.01	0.231	$238^{(2)}$	00-A-712-S4
EP23	EU23	40% ⁽¹⁾	0.01	0.231	238 ⁽²⁾	00-A-713-S4
EP28	EU28	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	03-A-402-S3
EP29	EU29	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	03-A-403-S3
EP30	EU30	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	03-A-1354-S2
EP32	EU32	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	06-A-509
EP33	EU33	40% ⁽³⁾	0.01	N/A	238 ⁽²⁾	07-A-1074
EP35	EU35	40% ⁽¹⁾	0.01	N/A	238 ⁽²⁾	07-A-1076

⁽¹⁾ An exceedence of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ This is a facility-wide limit for the solvent and coating material VOC emissions at Woodharbor. The limit was requested for the facility to remain a synthetic minor for PSD.

(3) An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

NESHAP Applicability

These emission units are subject to the National Emission Standards for Hazardous Air Pollutant: 40 CFR 63 Subpart JJ-National Emission Standards for Wood Furniture Manufacturing Operations. Specific requirements are listed below.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

For unit EU30 only

A. The owner or operator shall not use any material with a solids content greater than 7.0 lbs per gallon in this spray booth.

Authority for Requirement: Iowa DNR Construction Permit 03-A-1354-S2

For units EU13 and EU32 only

- A. The owner or operator shall use no more than 56,000 gallons of paint and solvent in spraying operations at this plant (Plant Number 17-01-068) per rolling twelve-month period.
- B. The owner or operator shall not use a paint or solvent with a VOC content greater than 8.51 pounds of VOC per gallon in spraying operations at this plant (Plant Number 17-01-068).

Authority for Requirement: Iowa DNR Construction Permits 06-A-508 and 06-A-509, respectively

Control equipment parameters:

A. The control equipment shall be maintained according to the manufacturer's specifications.

Work practice standards:

- A. All spray materials shall meet the emission requirements per 40 CFR 63.802 which includes, but is not limited to, limiting the VHAP emissions from finishing operations, contact adhesives and strippable spray operations.
- B. The owner or operator shall comply with the work practice standards outlined in 40 CFR 63.803.

C. The owner or operator shall comply with the compliance procedures and monitoring requirements of 63.804 and the performance test methods of 40 CFR 63.805.

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Spray Booths-Emission Limits

For units EU15, EU19, EU20, EU21, EU22 and EU23 only

A. The owner or operator shall not use more than one spray gun in each booth. Additional guns may be installed to facilitate color changes.

Authority for Requirement: Iowa DNR Construction Permits 07-A-1552, 00-A-709-S4, 00-A-710-S4, 00-A-711-S4, 00-A-712-S4, and 00-A-713-S4, respectively

For units EU3, EU8, EU9, EU10, EU14, EU28 and EU29 only

A. The owner or operator shall not install more than three spray guns in each booth. The total spray capacity of all the spray guns used in each booth shall not exceed 30 fluid ounces per minute.

Authority for Requirement: Iowa DNR Construction Permits 94-A-482-S8, 98-A-064-S7, 98-A-065-S7, 98-A-066-S7, 99-A-415-S6, 03-A-402-S3, and 03-A-403-S3, respectively

For units EU13 and EU32 only

A. The owner or operator shall not install more than one spray gun in each booth.

Authority for Requirement: Iowa DNR Construction Permits 06-A-508 and 06-A-509, respectively

For unit EU30 only

A. The owner or operator shall not install more than eight spray gun in this booth at any one time. The total spray capacity of the eight spray guns used in this booth shall not exceed 112.5 fluid ounces per minute. (Note: System has 16 spray guns of which up to 8 will be used at any one time).

Authority for Requirement: Iowa DNR Construction Permit 03-A-1354-S2

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years (unless otherwise specifically required in NESHAP Subpart: JJ) and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The owner or operator shall maintain a record of control equipment maintenance and inspection results.
- B. The owner or operator shall perform the record keeping requirements of §63.806 and reporting requirements of §63.807.
- C. The owner or operator shall maintain a record of the number of spray guns used in each spray booth. The owner or operator shall also maintain a copy of the manufacturers specifications of each spray gun used in each booth.

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Spray Booths-Emission Limits

For units EU13 and EU32 only

- A. The owner or operator shall record the amount of paint and solvent used at this plant (Plant Number 07-01-145) each month. Calculate a rolling twelve-month total.
- B. The owner or operator shall maintain a Material Safety Data Sheet (MSDS) for each paint and solvent used at this plant (Plant Number 07-01-145). This MSDS shall have the VOC content of the material stated on it.

Authority for Requirement: Iowa DNR Construction Permits 06-A-508 and 06-A-509, respectively

- A. The facility shall maintain a log of all materials used at the facility (Plant Number 17-01-068). The log shall contain the materials respective VOC, Single HAP and Total HAP content, (in lb/gal).
- B. The facility shall record the monthly material usage (units of gal/month) for each VOC-containing material used at the facility (Plant Number 17-01-068) until the VOC emissions of the coatings and solvents used in the spray booths exceed 200 TPY. At this point the owner or operator shall immediately begin keeping daily records of the material use (units of gal/day) and begin keeping a 365-day rolling total amount of solvent and coatings used. Recordkeeping requirements will revert back to a monthly basis if the 365-day rolling total of VOC emissions is returned to below 200 TPY for 30 days.
- C. Calculate the VOC emissions in tons (from all sources that use solvents and coatings) for the facility on a monthly basis and keep a 12-month rolling total. Records for VOC emissions shall be kept on a monthly basis until the VOC emissions of the coatings and solvents used in the spray booths exceed 200 TPY. At this point the owner or operator shall immediately begin keeping a 365-day rolling total amount of VOC emitted at the facility. Calculation requirements will revert back to a monthly basis if the 365-day rolling total of VOC emissions is returned to below 200 TPY for 30 days.
- D. The owner or operator may take credit for any waste VOC shipped off-site. The owner or operator shall record the amount of waste shipped off-site, and also analyze the VOC content, of the waste once every calendar year quarter. The sample analyzed shall be taken as a representative sample (as defined in 40 CFR 260.10) of the waste sent off-site for that quarter and shall be taken as representative until the subsequent quarter's analysis is received. The credit (calculated from the most current analysis and the amount shipped off-site) may be subtracted from the VOC rolling totals as of the date the waste is shipped off-site.
- E. Retain Material Safety Data Sheets (MSDS) for all reagents, surface coating materials, solvents and other HAP and VOC-containing material used at the facility (Plant Number 17-01-068).

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Spray Booths-Emission Limits **except** 06-A-508 and 06-A-509

Emission Point Characteristics

These emission points shall conform to the specifications listed below.

Table: Spray Booths – Emission Point Characteristics

		,	Stack Characteristics				
Emission Point Number	Associated Emission Unit Number	Construction Permit No.	Height (feet)	Diameter (inches)	Exhaust Flowrate (scfm)	Exhaust Temp. (°F)	Discharge Style
EP3	EU3	94-A-482-S8	30	24	18,000	Ambient	Vertical Unobstructed
EP8	EU8	98-A-064-S7	32	34	14,800	Ambient	Vertical Unobstructed
EP9	EU9	98-A-065-S7	32	34	14,800	Ambient	Vertical Unobstructed
EP10	EU10	98-A-066-S7	32	34	12,100	Ambient	Vertical Unobstructed
EP13	EU13	06-A-508	30	24	8,000	Ambient	Vertical Unobstructed
EP14	EU14	99-A-415-S6	30	36	25,000	Ambient	Vertical Unobstructed
EP15	EU15	07-A-1552	30	34	14,000	Ambient	Vertical
EP19	EU19	00-A-709-S4	28	34	13,450	Ambient	Vertical Unobstructed
EP20	EU20	00-A-710-S4	28	34	13,450	Ambient	Vertical Unobstructed
EP21	EU21	00-A-711-S4	28	34	13,450	Ambient	Vertical Unobstructed
EP22	EU22	00-A-712-S4	28	34	13,450	Ambient	Vertical Unobstructed
EP23	EU23	00-A-713-S4	28	34	13,450	Ambient	Vertical Unobstructed
EP28	EU28	03-A-402-S3	30	42	14,500	Ambient	Vertical Unobstructed
EP29	EU29	03-A-403-S3	30	42	14,500	Ambient	Vertical Unobstructed
EP30	EU30	03-A-1354-S2	30	20	10,700	Ambient	Vertical Obstructed
EP32	EU32	06-A-509	30	24	8,000	Ambient	Vertical Unobstructed
EP33	EU33	07-A-1074	30	12	1,200	70	Vertical Unobstructed
EP35	EU35	07-A-1076	30	30	14,000	Ambient	Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Spray Booths

– Emission Point Characteristics

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

minimum of five years.

Agency Approved Operation & Maintenance Plan Required? Relevant requirements of O & M plan for this equipment: Particulate M	Yes No Catter
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Authority for Requirement: 567 IAC 22.108(3)

Spray Coating Booth Filter Agency Operation & Maintenance Plan

Weekly

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and available upon request.

Quality Control

• The filter equipment will be operated and maintained according to the manufacturers recommendations.

Emission Point ID Number: See Table: Ovens

Associated Equipment

Associated Emission Unit ID Numbers: See Table: Ovens

Table: Ovens

Emission Point Number	Associated Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity (lb/hr)
EP31	EU31	Flat Line Drying Oven	N/A	N/A
EP34	EU34	UV Cure Oven	N/A	N/A

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 07-A-1075 (EP34)

567 IAC 23.3(2)"d"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 238 tons/yr⁽¹⁾

(1) This is a facility-wide limit for the solvent and coating material VOC emissions at Woodharbor. The limit was requested for the facility to remain a synthetic minor for PSD.

Authority for Requirement: Iowa DNR Construction Permit 07-A-1075 (EP34) 567 IAC 22.108(13)

⁽¹⁾ An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Emission Point Characteristics

These emission points shall conform to the specifications listed below.

Table: Ovens – Emission Point Characteristics

			Stack Characteristics				
Emission Point Number	Associated Emission Unit Number	Construction Permit No.	Height (feet)	Diameter (inches)	Exhaust Flowrate (scfm)	Exhaust Temp. (°F)	Discharge Style
EP31	EU31	03-A-1355	30	14	3,228	120	Vertical Obstructed
EP34	EU34	07-A-1075	30	12	2,000	200	Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permits specified in Table: Ovens – Emission Point Characteristics

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

minimum of five years.

Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Emission Point ID Number: EP4

Associated Equipment

Associated Emission Unit ID Number: EU4

Emission Unit vented through this Emission Point: EU4

Emission Unit Description: Welding Bench

Raw Material/Fuel: Welding Wire

Rated Capacity: 0.69 lb/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permit 94-A-483-S2

567 IAC 23.3(2)"d"

(1) An exceedence of the indicator opacity of 25% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter (PM) Emission Limit(s): 0.1 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 94-A-483-S2

567 IAC 23.3(2)"a"

Pollutant: PM₁₀

Emission Limit(s): 0.18 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 94-A-483-S2

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. Record the type and amount of welding wire used in this unit. Calculate and record monthly and 12-month totals.

Authority for Requirement: Iowa DNR Construction Permit 94-A-483-S2

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 30 Stack Opening, (inches, dia.): 12 Exhaust Flow Rate (scfm): 2,500 Exhaust Temperature (°F): Ambient

Discharge Style: Vertical Obstructed

Authority for Requirement: Iowa DNR Construction Permit 94-A-483-S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes ☐ No ⊠
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🔀
Compliance Assurance Monitoring (CAM) Plan Required?	Yes ☐ No ⊠

Emission Point ID Number: EP16

Associated Equipment

Associated Emission Unit ID Number: EU16

Emission Unit vented through this Emission Point: EU16

Emission Unit Description: Adhesive Application Raw Material/Fuel: Various Assembly Adhesives

Rated Capacity: 3.56 gal/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 3.18 tons/yr⁽¹⁾

(1) This limit was requested by the applicant.

Authority for Requirement: Iowa DNR Construction Permit 03-A-1248

NESHAP Applicability

This emission unit is subject to the National Emission Standards for Hazardous Air Pollutant: 40 CFR 63 Subpart JJ-National Emission Standards for Wood Furniture Manufacturing Operations. Specific requirements are listed below.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- A. The owner or operator shall not use more than 75gallons of adhesive with a VOC content greater than 6.5 pounds per gallon and with a maximum VOC content of 12.0 pounds per gallon per twelve-month rolling period at EU16, Adhesive Application.
- B. The owner or operator shall not use more than 245 gallons of adhesive with a VOC content greater than 4.5 pounds per gallon and with a maximum VOC content of 6.5 pounds per gallon per twelve-month rolling period at EU16, Adhesive Application.
- C. The owner or operator shall not use more than 350 gallons of adhesive with a VOC content greater than 0.075 pounds per gallon and with a maximum VOC content of 4.5 pounds per gallon per twelve-month rolling period at EU16, Adhesive Application.

D. The owner or operator shall not use more than 30,500 gallons of adhesive with a VOC content greater than 0.001 pounds per gallon and with a maximum VOC content of 0.075 pounds per gallon per twelve-month rolling period at EU16, Adhesive Application.

Authority for Requirement: Iowa DNR Construction Permit 03-A-1248

The permittee shall limit VHAP (volatile hazardous air pollutant) emissions from contact adhesives used for the manufacture of wood furniture or wood furniture parts by achieving a VHAP limit for contact adhesives based on the following criteria:

- A. For foam adhesives (contact adhesives used for upholstery operations) used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association (BIFMA's)X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies, the VHAP content of the adhesive shall not exceed 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied; or
- B. For all other contact adhesives (including foam adhesives used in products that do not meet the standards presented in paragraph (B)(a) of this section, but excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied.

Authority for Requirement: 40 CFR 63.802(a)(2)

567 IAC 23.1(4)"aj"

Work practice standards:

A. Work practice standards as outlined in 40 CFR 63.803 shall be followed.

Reporting & Record keeping: All records, as required by this permit, shall be kept on-site for a minimum of five years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. Record the amount of adhesive used at EU16, Adhesive Application, in gallons each month for each VOC content range as delineated above. Calculate and record twelvementh rolling totals.
- B. Record the VOC content of all adhesives used at EU16, Adhesive Application, in pounds per gallon.
- C. The owner or operator shall maintain MSDS for all adhesive used at EU16, Adhesive Application.

Authority for Requirement: Iowa DNR Construction Permit 03-A-1248

Monitoring Requirements The owner/operator of this equipment shall comply with the monitor below.	ring requirements listed
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂

Emission Point ID Numbers: EP24A and 24B

Associated Equipment

Associated Emission Unit ID Number: EU24

Emission Unit vented through this Emission Point: EU24

Emission Unit Description: Pump Room/Inventory Holding Area

Raw Material/Fuel: Various Coatings and Solvents

Rated Capacity: N/A

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permits 00-A-723-S2 (EP24A) and

00-A-724 (EP24B) 567 IAC 23.3(2)"d"

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 238 tons/yr⁽¹⁾

Authority for Requirement: Iowa DNR Construction Permits 00-A-723-S2 (EP24A) and

00-A-724 (EP24B)

NESHAP Applicability

This emission unit is subject to the National Emission Standards for Hazardous Air Pollutant: 40 CFR 63 Subpart JJ-National Emission Standards for Wood Furniture Manufacturing Operations. Specific requirements are listed below.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

⁽¹⁾ An exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ This is a facility-wide limit for the solvent and coating material VOC emissions at Woodharbor. The limit was requested for the facility to remain a synthetic minor for PSD.

Work practice standards:

- A. All spray materials shall meet the emission limit requirements of 60 CFR 63.802 which includes, but is not limited to, limiting the VHAP emissions from Finishing operations, contact adhesives and strippable spray booth coatings.
- B. All work practices, as outlined in 40 CFR 63.803 shall be followed.
- C. Compliance procedures and monitoring requirements outlined in 40 CFR 63.804 and the performance test methods outlined in 40 CFR 63.805 shall be followed.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. All records required by 40 CFR 63.806 shall be maintained.
- B. All reporting requirements of 40 CCFR 63.807 shall be followed.

Authority for Requirement: Iowa DNR Construction Permits 00-A-723-S2 (EP24A) and 00-A-724 (EP24B)

Emission Point Characteristics

The emission points shall conform to the specifications listed below.

Stack Height, (ft, from the ground): 24 Stack Opening, (inches, dia.): 30 Exhaust Flow Rate (scfm): 2,275

Exhaust Temperature (°F): Ambient (70) Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permits 00-A-723-S2 (EP24A) and

00-A-724 (EP24B)

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maint	enance Plan Required?	Yes 🗌	No 🖂
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Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)	

Emission Point ID Number: EP26

Associated Equipment

Associated Emission Unit ID Number: EU26

Emission Unit vented through this Emission Point: EU26

Emission Unit Description: Putty Application Raw Material/Fuel: Various Assembly Putties

Rated Capacity: 0.10 gal/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- A. This source is limited to using a maximum of 900 gallons of putty during any twelvemonth rolling period.
- B. The VOC content of putties used shall not exceed 4.0 lb/gal.

Authority for Requirement: 567 IAC 22.108(14)

Reporting & Record keeping: All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. Record the amount, in gallons, of each material used at this source daily. Calculate monthly and rolling twelve-month usage and VOC emission totals.
- B. Maintain all Material Safety Data Sheets (MSDS) for all materials used at this source.

Monitoring Requirements	
The owner/operator of this equipment shall comply with the monitor	oring requirements listed
below.	
Agency Approved Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
	**
Facility Maintained Operation & Maintenance Plan Required?	Yes 🗌 No 🖂
Compliance Assurance Manitoring (CAM) Plan Possined?	Vag 🗆 Na 🖂
Compliance Assurance Monitoring (CAM) Plan Required?	Yes 🔲 No 🖂

Emission Point ID Number: EP27

Associated Equipment

Associated Emission Unit ID Number: EU27

Emission Unit vented through this Emission Point: EU27

Emission Unit Description: Parts Washer Raw Material/Fuel: Various Solvents

Rated Capacity: 0.06 gal/hr

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

There are no emission limits at this time.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- A. The owner or operator shall not use more than 500 gallons of solvent in parts washers at this plant (Plant Number: 17-01-068) per rolling twelve-month period.
- B. The owner or operator shall not use a solvent with a VOC content greater than 6.5 pounds of VOC per gallon in parts washers at this plant (Plant Number: 17-01-068).
- C. The owner or operator shall not use a solvent with a Methylene Chloride (CAS # 75-09-2), Perchloroethylene (CAS # 127-18-4), Trichloroethylene (CAS # 79-01-6), 1,1,1-Trichloroethane (CAS # 71-55-6), Carbon Tetrachloride (CAS # 56-23-5) or Chloroform (CAS # 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5% by weight.

Reporting & Record keeping: All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The owner or operator shall record the amount of solvent used in parts washers at this plant (Plant Number 17-01-068) each month. Calculate a rolling twelve-month total.
- B. The owner or operator shall maintain a Material Safety Data Sheets (MSDS) for each solvent used at this plant (Plant Number 17-01-068).

Authority for Requirement: Iowa DNR Construction Permit 03-A-336

Monitoring Requirements

The owner/operator of this equipment shall comply with the monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?

Yes □ No □

Facility Maintained Operation & Maintenance Plan Required?

Yes □ No □

Authority for Requirement: 567 IAC 22.108(3)

Compliance Assurance Monitoring (CAM) Plan Required?

Yes No No

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

- 1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 22.108(9)"a"
- 2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 22.105 (2)"h"(3)
- 3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 22.108 (1)"b"
- 4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 22.108 (14)
- 5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. 567 IAC 22.108 (9)"b"

G2. Permit Expiration

- 1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. 567 IAC 22.116(2)
- 2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, two copies (three if your facility is located in Linn or Polk county) of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. An additional copy must also be sent to EPA Region VII, Attention: Chief of Air Permits, 901 N. 5th St., Kansas City, KS 66101. The application must include all emission points, emission units, air pollution control equipment, and monitoring devices at the facility. All emissions generating activities, including fugitive emissions, must be included. The definition of a complete application is as indicated in 567 IAC 22.105(2). 567 IAC 22.105

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 22.107 (4)

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the

compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

G6. Annual Fee

- 1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
- 2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
- 3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
- 4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
- 5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
- 6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
- 7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
- 8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

- 1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

- 1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
- 2. Remedy any cause of excess emissions in an expeditious manner.
- 3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
- 4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

G10. Recordkeeping Requirements for Compliance Monitoring

- 1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
 - a. The date, place and time of sampling or measurements
 - b. The date the analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
 - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
- 2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

- 3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
 - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
 - b. Maintain a log at the permitted facility of the scenario under which it is operating.
 - c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 22.108(4), 567 IAC 22.108(12)

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein. 1. Information from the use of the following methods is presumptively credible evidence of

whether a violation has occurred at a source:

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
- b. Compliance test methods specified in 567 Chapter 25; or
- c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
- 2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a. Any monitoring or testing methods provided in these rules; or
 - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 22.108(6)

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process

equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

- a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable emission standard by more than 10 percent or the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:
 - i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
 - ii. The estimated quantity of the excess emission.
 - iii. The time and expected duration of the excess emission.
 - iv. The cause of the excess emission.
 - v. The steps being taken to remedy the excess emission.
 - vi. The steps being taken to limit the excess emission in the interim period.
- b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
 - i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
 - ii. The estimated quantity of the excess emission.
 - iii. The time and duration of the excess emission.

- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)
- 3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The facility at the time was being properly operated;
 - c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
 - d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. 567 IAC 22.108(16)

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 22.108(5)"b"

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(4)

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:

- a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
- b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
- c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
- d. The changes are not subject to any requirement under Title IV of the Act.
- e. The changes comply with all applicable requirements.
- f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
 - i. A brief description of the change within the permitted facility,
 - ii. The date on which the change will occur,
 - iii. Any change in emission as a result of that change,
 - iv. The pollutants emitted subject to the emissions trade
 - v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
 - vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
 - vii. Any permit term or condition no longer applicable as a result of the change. 567 IAC 22.110(1)
- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 22.110(2)
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). 567 IAC 22.110(3)
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 22.110(4)
- 5. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 22.108(11)

G18. Duty to Modify a Title V Permit

- 1. Administrative Amendment.
 - a. An administrative permit amendment is a permit revision that is required to do any of the following:

- i. Correct typographical errors
- ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source:
- iii. Require more frequent monitoring or reporting by the permittee; or
- iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
- b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
- c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

2. Minor Permit Modification.

- a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
 - i. Do not violate any applicable requirements
 - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
 - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
 - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
 - v. Are not modifications under any provision of Title I of the Act; and
 - vi. Are not required to be processed as significant modification.
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
 - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
 - ii. The permittee's suggested draft permit
 - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
 - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this

change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.105(1)"a"(4)

G19. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. 567 IAC 22.1(1)

G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when activities involve asbestos mills, surfacing of roadways, manufacturing operations, fabricating, insulating, waste disposal, spraying applications, demolition and renovation operations, training fires and controlled burning of a demolished building. 567 IAC 23.1(3)"a", and 567 IAC 23.2

G21. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. 567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
 - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
- 5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

G24. Permit Reopenings

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or

termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 22.108(9)"c"

- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
 - a. Reopening and revision on this ground is <u>not</u> required if the permit has a remaining term of less than three years;
 - b. Reopening and revision on this ground is <u>not</u> required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to May 15, 2001.
 - c. Reopening and revision on this ground is <u>not</u> required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. 567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"
- 3. A permit shall be reopened and revised under any of the following circumstances:
 - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to July 21, 1992, provided that the reopening may be stayed pending judicial review of that determination;
 - b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
 - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
 - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. 567 IAC 22.114(1)
- 4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 22.114(2)

G25. Permit Shield

1. The director may expressly include in a Title V permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the permit; or
 - b. The director, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- 2. A Title V permit that does not expressly state that a permit shield exists shall be presumed not to provide such a shield.
- 3. A permit shield shall not alter or affect the following:
 - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the administrator under that section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act:
 - d. The ability of the department or the administrator to obtain information from the facility pursuant to Section 114 of the Act. 567 IAC 22.108 (18)

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 22.108 (9)"d"

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. 567 IAC 22.111 (1)"d"

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with applicable requirements of 567 – Chapter 23 or a permit condition. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum

production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator Iowa DNR, Air Quality Bureau 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program. 567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits

EPA Region 7

Air Permits and Compliance Branch

901 N. 5th Street

Kansas City, KS 66101

(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

909 West Main – Suite 4 Manchester, IA 52057 (563) 927-2640 **Field Office 2** 2300-15th St., SW Mason City, IA 50401 (641) 424-4073

Field Office 3

1900 N. Grand Ave. Spencer, IA 51301 (712) 262-4177

Field Office 5

401 SW 7th Street, Suite I Des Moines, IA 50309 (515) 725-0268

Polk County Public Works Dept.

Air Quality Division 5885 NE 14th St. Des Moines, IA 50313 (515) 286-3351

Field Office 4

1401 Sunnyside Lane Atlantic, IA 50022 (712) 243-1934

Field Office 6

1023 West Madison Street Washington, IA 52353-1623 (319) 653-2135

Linn County Public Health Dept.

Air Pollution Control Division 501 13th St., NW Cedar Rapids, IA 52405 (319) 892-6000

Appendix A: Woodworking CAM Plans

Compliance Assurance Monitoring Plan for Woodharbor Production Facility

Mason City, Iowa

May, 2008

Part One — Various Woodworking Sources EU5

I. Background

A. <u>Emissions Unit</u>

Description: Equipment for sawing, sanding, etc of wood

Identification: EP5 and EP6

Facility: Woodharbor Molding and Millworks Mason

City, Iowa

B. Applicable Regulation_, Emission Limit, and Monitoring Requirements

Regulation No.: 567 IAC 23.3(2)a

Particulate emission limit: 2.04 lb/hr

Monitoring requirements: Fabric Filter Operating Parameters

C. Control Technology

Fabric Filter

II. Monitoring Approach

A. <u>Indicators</u>

Visible emissions and pressure drop across the fabric filter.

B. Measurement Approach

Parametric monitoring is performed. Visible emissions will be monitored once per week while the process is operating. Pressure drop across the fabric filter will be monitored once per day while the process is operating.

C. Indicator Ranges

The emissions from the fabric filter will be observed and determined to be normal or abnormal. Normal is defined as no visible emissions except for water vapor. Abnormal is defined as the presence of visible emissions except for water vapor. A visual emissions excursion is defined as monitored visual emissions other than normal.

A pressure drop excursion is a pressure drop less than 0.5" w.c. or greater than 10" w.c.

Excursions trigger an inspection, corrective action, and a reporting requirement in accordance with the facility's Operation and Maintenance Plan.

D. QIP Threshold

The Quality Improvement Plan (QIP) threshold is three (5%) instances of pressure drop readings outside the specified range or 5% of instances of visible emissions during a 12-month period.

E. Performance Criteria

Data representativeness:

For this process, abnormal visible emissions are an indicator of poor fabric filter performance.

Pressure drop that is below the established range can indicate a broken bag or other problem with the baghouse function. Pressure drop that is above the established range can indicate that the bag cleaning function is not operating properly or that the bags are not functioning properly.

Verification of operational status:

Visible emissions are checked once per week while the fabric filter is operating. The pressure drop is checked once per day while the fabric filter is operating. The fabric filter will be maintained in good working condition according to the manufacturer's operating and maintenance (O&M) procedures.

QA/QC practices and criteria:

Monitoring the visible emissions and pressure drop will serve to alert the facility in circumstances when the fabric filter experiences operational failures. Any recorded abnormal visible emissions or pressure drop outside the specified range will signify an excursion.

When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required. After any necessary corrective action has been taken, a follow-up check will be performed to insure that the indicator is within the indicator range.

Monitoring frequency and data collection procedure:

Visible emissions readings will be monitored and recorded once per week while the fabric filter is operating. Pressure drop readings will be monitored and recorded once per day while the fabric filter is operating.

Part Two - Various Woodworking Sources EU7

Ι. **Background**

A. **Emissions Unit**

Description: Equipment for sawing, sanding, etc of wood

Identification: EU7

Facility: Woodharbor Molding and Millworks

Mason City, Iowa

В. Applicable Regulation, Emission Limit and Monitoring Requirements

Regulation No.: 567 FAC 22.108(13)

Particulate emission limit: 0.01 gr/dscf

Fabric Filter Operating Parameters Monitoring requirements:

C. Control Technology

Fabric Filter

II. Monitoring Approach

A. Indicators

Visible emissions and pressure drop across the fabric filter.

В. Measurement Approach

Parametric monitoring is performed. Visible emissions will be monitored once per week while the process is operating. Pressure drop across the fabric filter will be monitored once per day while the process is operating.

C. Indicator Ranges

The emissions from the fabric filter will be observed and determined to be normal or abnormal. Normal is defined as no visible emissions except for water vapor. Abnormal is defined as the presence of visible emissions except for water vapor. A visual emissions excursion is defined as monitored visual emissions other than normal.

A pressure drop excursion is a pressure drop less than 0.5" w.c. or greater than 10" w.c.

Excursions trigger an inspection, corrective action, and a reporting requirement in accordance with the facility's Operation and Maintenance Plan.

D. **QIP Threshold**

The Quality Improvement Plan (QIP) threshold is three (5%) instances of pressure drop readings outside the specified range or 5% of instances of visible emissions during a 12-month period.

E. Performance Criteria

Data representativeness:

For this process, abnormal visible emissions are an indicator of poor fabric filter performance.

Pressure drop that is below the established range can indicate a broken bag or other problem with the baghouse function. Pressure drop that is above the established range can indicate that the bag cleaning function is not operating properly or that the bags are not functioning properly.

Verification of operational status:

Visible emissions are checked once per week while the fabric filter is operating. The pressure drop is checked once per day while the fabric filter is operating. The fabric filter will be maintained in good working condition according to the manufacturer's operating and maintenance (O&M) procedures.

QA/QC practices and criteria:

Monitoring the visible emissions and pressure drop will serve to alert the facility in circumstances when the fabric filter experiences operational failures. Any recorded abnormal visible emissions or pressure drop outside the specified range will signify an excursion.

When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required. After any necessary corrective action has been taken, a follow-up check will be performed to insure that the indicator is within the indicator range.

Monitoring frequency and data collection procedure:

Visible emissions readings will be monitored and recorded once per week while the fabric filter is operating. Pressure drop readings will be monitored and recorded once per day while the fabric filter is operating.

Part Three — Various Woodworking Sources EU25

I. Background

Α. **Emissions Unit**

Description: Equipment for sawing, sanding, etc of wood

Identification: EU25

Facility: Woodharbor Molding and Millworks, Mason City, Iowa

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Construction Permit 01-A-1069 Regulation No

Particulate emission limit: 3.53 lb/hr

Fabric Filter Operating Parameters Monitoring requirements:

C. Control Technology

Fabric Filter

Ш Monitoring Approach

A. Indicators

Visible emissions and pressure drop across the fabric filter.

B. Measurement Approach

Parametric monitoring is performed. Visible emissions will be monitored once per week while the process is operating. Pressure drop across the fabric filter will be monitored once per day while the process is operating.

C. **Indicator Ranges**

The emissions from the fabric filter will be observed and determined to be normal or abnormal. Normal is defined as no visible emissions except for water vapor. Abnormal is defined as the presence of visible emissions except for water vapor.

A visual emissions excursion is defined as monitored visual emissions other than normal.

A pressure drop excursion is a pressure drop less than 0.5" w.c. or greater than 10" w.c.

Excursions trigger an inspection, corrective action, and a reporting requirement in accordance with the facility's Operation and Maintenance Plan.

D. **QIP Threshold**

The Quality Improvement Plan (QIP) threshold is three (5%) instances of pressure drop readings outside the specified range or 5% of instances of visible emissions during a 12-month period.

E. Performance Criteria

Data representativeness:

For this process, abnormal visible emissions are an indicator of poor fabric filter performance.

Pressure drop that is below the established range can indicate a broken bag or other problem with the baghouse function. Pressure drop that is above the established range can indicate that the bag cleaning function is not operating properly or that the bags are not functioning properly.

Verification of operational status:

Visible emissions are checked once per week while the fabric filter is operating. The pressure drop is checked once per day while the fabric filter is operating. The fabric filter will be maintained in good working condition according to the manufacturer's operating and maintenance (O&M) procedures.

QA/QC practices and criteria:

Monitoring the visible emissions and pressure drop will serve to alert the facility in circumstances when the fabric filter experiences operational failures. Any recorded abnormal visible emissions or pressure drop outside the specified range will signify an excursion.

When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required. After any necessary corrective action has been taken, a follow-up check will be performed to insure that the indicator is within the indicator range.

Monitoring frequency and data collection procedure:

Visible emissions readings will be monitored and recorded once per week while the fabric filter is operating. Pressure drop readings will be monitored and recorded once per day while the fabric filter is operating.